

LOCKRIDGE GRINDAL NAUEN P.L.L.P.
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JI KWON, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

ROBINHOOD FINANCIAL LLC, and
ROBINHOOD SECURITIES, LLC,

Defendant.

) Case No. 20-cv-09328-YGR

)

)

) **PLAINTIFF GHEBREHIWET'S**
) **RESPONSE TO JI KWON MOTION**
) **FOR CONSOLIDATION OF ACTIONS;**
) **APPOINTMENT AS LEAD PLAINTIFF;**
) **AND APPROVAL OF LEAD COUNSEL**

)

) Hon. Yvonne Gonzalez Rogers

)

) Courtroom Room 1, 1301 Clay Street,
4th Floor, Oakland, CA

)

) Date: April 13, 2021

) Time: 2:00 p.m.

PLAINTIFF GHEBREHIWET'S RESPONSE TO JI KWON
MOTION FOR CONSOLIDATION OF ACTIONS, APPOINTMENT
AS LEAD PLAINTIFF; AND APPROVAL OF LEAD COUNSEL
CASE No. 20-cv-09328-YGR

Plaintiff Robel Ghebrehiwet (“Plaintiff”) respectfully submits this Memorandum of Points and Authorities in Response to Plaintiff Ji Kwon’s Motion for Consolidation of Actions; Appointment as Lead Plaintiff; and Approval of Lead Counsel (“Motion”). First, although not yet transferred from the Southern District of California, Plaintiff’s action (entitled *Robel Ghebrehiwet, et al. v. Robinhood Financial LLC, et al.*, Court File 21-cv-01739 (N.D. Calif.) and Court File 21-cv-00214-AJB-AGS (S.D. Calif.)), the Motion properly noted that following transfer it would be appropriate to consolidate. The Motion also included Plaintiff’s action in the proposed consolidated caption.

As Plaintiff’s case is now transferred, Plaintiff formally joins in that request of consolidation of his case with the other actions pending before this Court.

Second, Plaintiff also joins in the Motion’s requested relief of appointing Ji Kwon as lead plaintiff and appointing Ahdoot & Wolfson, PC; Bursor & Fisher, P.A., and Liddle & Dubin P.C. as Lead Counsel.

DATED: March 23, 2021

Respectfully submitted,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

s/ Rebecca A. Peterson

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I declare under penalty of perjury that the foregoing is true and correct.

By: s/ Rebecca A. Peterson
REBECCA A. PETERSON